

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

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|------------------------------------|---|---------------------------------|
| IN RE: |) | |
| |) | Case No. 3:20-bk-03559 |
| JAMES WHITFIELD LIVINGSTON, |) | Chapter 7 |
| |) | Judge Marion F. Harrison |
| Debtor. |) | |

MOTION TO EXTEND DEADLINE TO RESPOND TO OBJECTIONS TO CLAIMS

COMES NOW, Milessa Thomas (“Ms. Thomas”) and Cassie Burton (“Ms. Burton”), both creditors and party-in-interest in the above-captioned case, by and through counsel of record, and for its Motion to Extend the Deadline for Complaints states:

1. The deadline for responding to the Objections of Claims [Docs. 128 & 129] filed by the Debtor is May 26, 2021. This Motion is timely filed.
2. Ms. Thomas and Ms. Burton are interested parties in this proceeding holding unsecured claims.
3. Ms. Thomas, Ms. Burton, and Mr. Livingston are preparing to mediate the filed claims, which may determine whether a need exists to litigate the Claim Objections.
4. The parties need additional time to complete mediation. Good cause exists to extend the deadline.
5. The deadline for response to the Objections to Claims should be extended up to and including September 1, 2021, for Ms. Thomas and Ms. Burton to file responses if the circumstances warrant.

6. Ms. Thomas and Ms. Burton's counsel has conferred with Debtors' counsel, and there is no objection to the requested relief. An Agreed Order shall be submitted to the Court.

WHEREFORE, Ms. Thomas and Ms. Burton pray that the deadline for responding to the Objections to Claims for Ms. Thomas and Ms. Burton be extended up to and including September 1, 2021, and for all other proper relief.

Respectfully submitted,

By: /s/ Matthew R. Murphy
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Attorney for Cassie Burton and
Milessa Thomas

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed and served via the Court's electronic case filing and noticing system to Debtor's Counsel, Steven L. Lefkovitz, the Chapter 7 Trustee, Robert H. Waldschmidt, and all parties registered to received electronic notices in this matter this 17th day of May, 2021.

/s/ Matthew R. Murphy
Matthew R. Murphy